

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION**

ANDREW “ANDY” THOMAS,)	
)	
PLAINTIFF,)	CASE NO.: 1:21-cv-2519-TWP-MJD
)	Judge Tanya Walton Pratt
v.)	Magistrate Judge Mark J. Dinsmore
)	
ooSHIRTS, INC. doing business)	
as www.teechip.com, et al.)	
)	
DEFENDANTS.)	

MOTION FOR LEAVE TO FILE MOTION UNDER SEAL

Pursuant to Local Rule 5-11, Plaintiff Andy Thomas, by and through the undersigned counsel, hereby request leave of Court to submit a motion, brief, and exhibits under seal. Plaintiff’s motion concerns the enforcement of the settlement agreement reached by the parties to resolve this matter. As the settlement agreement contemplates confidentiality, Plaintiff asks leave of Court to file under seal to maintain such confidentiality while requesting enforcement of the terms agreed by the parties. Plaintiff requests three (3) days from the date of the order to file his motion to enforce settlement agreement, brief in support of the motion, and exhibits under seal.

Plaintiff’s counsel has conferred with Defendant ooShirts, Inc.’s counsel regarding this motion. Defendant ooShirts, Inc.’s counsel does not oppose or consent to this motion requesting leave to file under seal. Defendant ooShirts’s counsel contests the motion to enforce settlement agreement.

WHEREFORE, Plaintiff requests an order from the Court granting Plaintiff leave to file under seal his motion to enforce settlement, a brief in support of said motion, and exhibits within three (3) days of the order; and all further relief the Court deems just and proper.

Dated: July 1, 2022.

Respectfully submitted,

/s/ Oliver Maguire

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CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that on this 1st day of July 2022 a copy of the foregoing motion was filed using the Court's CM/ECF system, which automatically sends notice to all counsel of record.

/s/ Oliver Maguire

Counsel for Plaintiff